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9 UNITED STATES DISTRICT COURT FOR THE  
10 WESTERN DISTRICT OF WASHINGTON  
11 AT SEATTLE

12 UNITED STATES OF AMERICA,

13 Plaintiff,

14 v.

15 MARVIN TRAYLOR,

16 Defendant.  
17

NO. CR21-120 JCC

INFORMATION

18 The Acting United States Attorney charges that:

19 **COUNT 1**

20 **(Possession of Controlled Substances with Intent to Distribute)**

21 On or about February 24, 2021, in Seattle, Washington, within the Western  
22 District of Washington, MARVIN TRAYLOR did knowingly and intentionally possess,  
23 with the intent to distribute, cocaine base in the form of crack cocaine, heroin and  
24 methamphetamine, all substances controlled under Title 21, United States Code, Section  
25 812.

26 All in violation of Title 21, United States Code, Section 841(a)(1) and  
27 841(b)(1)(C).  
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**COUNT 2****(Carrying a Firearm During and in Relation to a Drug Trafficking Crime)**

On or about February 24, 2021, in Seattle, Washington, within the Western District of Washington, MARVIN TRAYLOR, during and in relation to the drug trafficking crime of *Possession of Controlled Substances with Intent to Distribute*, as charged in Count 1, above, did knowingly and intentionally carry a firearm, to wit, one Walther 9mm semiautomatic pistol, bearing serial number WK114238.

All in violation of Title 18, United States Code, Section 924(c)(1)(A)(i).

**ASSET FORFEITURE ALLEGATION**

The allegations contained in this Information are hereby realleged and incorporated by reference for the purpose of alleging forfeiture.

Upon conviction of the offense alleged in Count 1, Defendant MARVIN TRAYLOR shall forfeit to the United States, pursuant to Title 21 United States Code, Section 853, any property that constitutes or is traceable to proceeds of the offense, as well as any property that facilitated the offense, including but not limited to: one Walther 9mm semiautomatic pistol, bearing serial number WK114238.

Upon conviction of the offense alleged in Count 2, Defendant MARVIN TRAYLOR shall forfeit to the United States, pursuant to Title 18, United States Code, Section 924(d)(1), by way of Title 28, United States Code, Section 2461(c), any firearms and associated ammunition that were involved in the offense, including but not limited to: one Walther 9mm semiautomatic pistol, bearing serial number WK114238.

**Substitute Assets.** If any of the property described above, as a result of any act or omission of the defendant:

- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third party;
- c. has been placed beyond the jurisdiction of the court;
- d. has been substantially diminished in value; or,

1 e. has been commingled with other property which cannot be divided  
2 without difficulty,  
3 it is the intent of the United States to seek the forfeiture of any other property of the  
4 defendant, up to the value of the above-described forfeitable property, pursuant to Title  
5 21, United States Code, Section 853(p).

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7 DATED this 21<sup>st</sup> day of July, 2021.  
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11 *Sarah G. Vogel, for*  
12 TESSA M. GORMAN  
13 Acting United States Attorney

14 *Vincent T. Lombardi*  
15 VINCENT T. LOMBARDI  
16 Assistant United States Attorney  
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